

FILED
U.S. DISTRICT COURT
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
2002 SEP 12 NORTHERN DIVISION

APRIL D. KYLE A/K/A
APRIL HUNTER,

Plaintiff,

v.

Civil Action No. MJG-02-CV-2920

ROBERT SIMS,
ET AL.,

Defendants.

**DEFENDANT CAMERA PRESS, LIMITED'S UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME WITHIN WHICH TO RESPOND TO COMPLAINT**

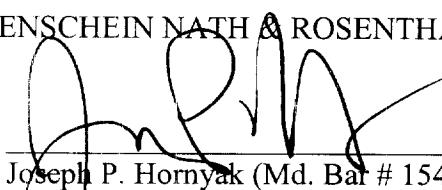
Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 105, and with the consent of Plaintiff's counsel, Defendant Camera Press, Limited ("Camera Press") respectfully requests an enlargement of time of two weeks, up to and including September 25, 2002, within which to respond to Plaintiff's Complaint. Camera Press' response is currently due on September 11, 2002. Plaintiff's counsel has represented that Plaintiff does not oppose this motion.

As grounds for this motion, Camera Press states that it is a United Kingdom company based in London, England. Camera Press did not have a pre-existing relationship with Maryland (or any U.S.) counsel, and only recently retained the undersigned counsel. Camera Press and its counsel are working diligently to reply to Plaintiff's Complaint as well as manage other pressing commitments, and therefore more time is needed. For the foregoing reasons, Camera Press respectfully requests that this Court grant an enlargement of time, up to and including September 25, 2002, within which to respond to Plaintiff's Complaint.

(9/29)

Respectfully submitted,

SONNENSCHEIN NATH & ROSENTHAL

By: 

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Appealed this 11th day of September 2002

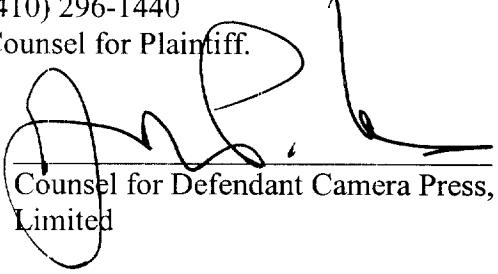


Marvin J. Garbis
United States District Judge

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that on this 10th day of September, 2002, a copy of the foregoing Defendant Camera Press, Limited's Unopposed Motion for Enlargement of Time Within Which to Respond to Complaint was served by U.S. Mail on:

Dennis F. O'Brien, P.A.
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Counsel for Plaintiff.


Counsel for Defendant Camera Press,
Limited